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**JAN 17 2003**

January 17, 2003

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**VIA ELECTRONIC FILING**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
236 Massachusetts Avenue, NE, Suite 110  
Washington, D.C. 20002

**Re: In the Matter of Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers and Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket Nos. 01-338; 96-98; 98-147**

Dear Ms. Dortch:

On January 16, 2003, David Boyaty of WorldNet Telecommunications, Inc. ("WorldNet") and the undersigned met individually with Commissioner Abernathy, Daniel Gonzalez, Legal Advisor to Commissioner Martin, and Lisa Zaina, Legal Advisor to Commissioner Adelstein, regarding the above-captioned docket. In the meeting, we discussed the Commission's examination of its UNE policies in light of the D.C. Circuit's *USTA* decision, and how the "impairment" analysis factors into the Commission's decision making. Additionally, we discussed the importance of UNE-P to WorldNet's ability to provide competitive telecommunications services in Puerto Rico, and to WorldNet's current migration to become a facilities-based carrier. WorldNet also emphasized that competition is nearly non-existent in Puerto Rico, and because of the unique characteristics of the island of Puerto Rico, the Commission should consider retaining UNE-P in Puerto Rico as a means of promoting facilities-based competition.

One electronic copy of this notice is being submitted for each of the referenced proceedings in accordance with the Commission's rules.

Respectfully submitted,

*Lawrence R. Freedman - AEK*  
Lawrence R. Freedman

ORIGINAL

Counsel for WorldNet Telecommunications, Inc

Cc: Commissioner Abernathy  
Daniel Gonzalez  
Lisa Zaina

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